

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

JULIO ALONZO ALVAREZ CHOC *ex rel.* )  
MATEO BA TUT and AURELIA CHE CUZ )  
DE BA, )

Plaintiffs, )

v. )

METROPOLITAN GOVERNMENT OF )  
NASHVILLE & DAVIDSON COUNTY, )  
TENNESSEE; )

and )

METRO NASHVILLE PUBLIC SCHOOLS )

and )

ESKOLA LLC; )

and )

JR. ROOFING & CONSTRUCTION LLC; )

and )

BUILDERS MUTUAL INSURANCE )  
COMPANY, )

Defendants. )

No. 3:24-cv-00836

Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Jeffery S. Frensley

JURY DEMAND

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NOTICE OF VOLUNTARY NONSUIT OF FEDERAL CLAIMS

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Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiffs hereby provide notice of dismissal *only* of their federal claims in this action. Specifically, Plaintiffs voluntarily dismiss **Count III** (Fair Labor Standards Act), **Count V** (Civil Rights Violations), and **Count VI** (Discriminatory

Abuse of Process) but only to the extent it is based on 42 U.S.C. § 1981 et seq.

Defendants have not answered or moved for summary judgment. The action is not subject to the provisions of Fed. R. Civ. P. 23(e) or 66, nor subject to any provision that would otherwise prevent voluntary dismissal. Dismissal of the above-referenced claims is made without prejudice.

Dated: March 31, 2025

Respectfully submitted,

/s/ Karla M. Campbell

Karla M. Campbell (TN BPR #027132)

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been served via CM/ECF or electronic mail to the following:

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This 31st day of March 2025.

/s/ Karla M. Campbell  
Karla M. Campbell